

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARTIN JOHN STEVENS,

Plaintiff,

-against-

ALAN J. HANKE, IOLO GLOBAL LLC,  
GUARANTEE INVESTMENT TRUST,  
SHERRY SIMS, SIDNEY MILLS ROGERS  
III, AMY ROY-HAEGER, and JOHN DOES  
1-100,

Defendants.

Case No.: 20-cv-08181 (JPC)

Related Proceeding:  
Case No.: 1:20-cv-4765 (JPC)

**NOTICE OF MOTION OF  
PLAINTIFF STEVENS'  
MOTION TO CONSOLIDATE  
RELATED PROCEEDINGS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declarations of David D. Holahan and Matthew A. Ducharme, executed on May 20, 2021, and the accompanying exhibits thereto, Plaintiff Martin John Stevens, joined by plaintiff in the related proceeding, *Mohammed Thani A.T. Al Thani v. Alan J. Hanke, IOLO Global LLC, et al.*, Case No.: 20-cv-4765 (JPC) (S.D.N.Y.) (the "Related Actions"), by and through his attorneys, Chelney Law Group PLLC, hereby moves this Court, before the Honorable John P. Cronan, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, Courtroom 20C, New York, New York 10007, at a date and time to be directed by the Court, for an Order:

- (i) pursuant to Rules 42(a)(2) of the Federal Rules of Civil Procedure, consolidating the Related Actions; and
- (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule set by the Court on May 20, 2021, opposition papers must be filed on or before June 10, 2021, and reply papers must be filed on or before June 17, 2021.

Dated: New York, New York  
May 20, 2021

Respectfully Submitted,  
CHELNEY LAW GROUP PLLC

By: /s/David D. Holahan  
Stan Chelney  
David D. Holahan

*Attorneys for Plaintiff*  
*Martin John Stevens*

28 Liberty Street, 6<sup>th</sup> Floor  
New York, N.Y. 10005  
Tel: (212) 653-0022

To:

Thomas H. Herndon, Jr., Esq.  
Kelechi Ajoku, Esq.  
Brooks, Berne & Herndon PLLC  
570 Taxter Road, Suite 550  
Elmsford, New York 10523  
Tel: (929) 285-3300  
Fax: (929) 285-3300  
Thomas.herndon@lawbbh.com  
Kelechi.ajoku@lawbbh.com  
*Attorneys for Defendants Hanke and IOLO*

As ordered by the Court on May 19, 2021, Plaintiff must respond to Defendant S. Mills Rogers, III's pre-motion letter before briefing on the motion to consolidate will go forward. *See* Dkt. 75. Accordingly, briefing on Plaintiff's motion to consolidate is stayed pending further order of the Court. Plaintiff shall respond to Defendant Rogers's pre-motion letter by May 24, 2021.

SO ORDERED.

Date: May 20, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge

Jeffrey Dweck, Esq.  
The Law Firm Of Jeffrey S. Dweck, P.C.  
43 West 33rd Street, Suite 304  
New York, New York 10001  
Tel: (212) 967-0500  
Fax: (212) 967-0501  
jeffrey@dweckny.com  
*Attorneys for Defendants Sims and GIT*

John G. McCarthy, Esq.  
Morgan V. Manley, Esq.  
Smith, Gambrell & Russell, LLP  
1301 Avenue of the Americas, 21st Fl  
New York, New York 10019  
Tel: (212) 907-9700  
Fax: (212) 907-9800  
jmccarthy@sgrlaw.com  
mmanley@sgrlaw.com  
*Attorneys for Defendant Rogers*

Amy Roy-Haeger  
7777 N Wickham Rd., Suite 12-322  
Melbourne, Fl. 32940 Tel:  
(561) 762-3293  
amyroyh@gmail.com  
*Pro Se Defendant Roy-Haeger*